

Fact Sheet



For Proposed Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on December 28, 2006.

Permit Number: **R30-05100002-2006**

Application Received: **June 1, 2010**

Plant Identification Number: **003-054-051-00002**

Permittee: **PPG Industries, Inc.**

Facility Name: **Natrium Plant**

Mailing Address: **P.O. Box 191, New Martinsville, West Virginia 26155**

Permit Action Number: *MM03* Revised: *Proposed*

Physical Location:	New Martinsville, Marshall County, West Virginia
UTM Coordinates:	512.70 km Easting • 4,399.60 km Northing • Zone 17
Directions:	WV State Route 2, 5 miles north of New Martinsville, WV

Facility Description

PPG Industries, Inc. owns and operates a Chlor-Alkali and Derivatives Plant in Marshall County, West Virginia commonly known as the PPG Natrium Plant. For details concerning the operations and products of the facility, refer to the fact sheet that accompanies the initial permit.

The PPG Natrium Facility has not produced organic products since September 29, 2008 and the Chlorobenzene Department was temporarily shutdown at the end of 2008. Equipment containing organic chemicals were cleared of any residual product and purged by the end of November 2008. In July 2009, it was determined to permanently shutdown the Chlorobenzene Department. Thus, PPG is requesting a modification to remove equipment that is no longer in service and requirements that are no longer applicable from this permit.

Emissions Summary

The following emission changes are associated with this modification:

Criteria Pollutants	Change in Potential Emissions (TPY)
Volatile Organic Compounds (VOC)	-38.2
Hazardous Air Pollutants (CAS No.)	Change in Potential Emissions (TPY)
1,2,4-Trichlorobenzene (120821)	-1.4*
1,4-Dichlorobenzene (106467)	-20.2*
Benzene (71432)	-1.9*
Carbon Disulfide (75150)	-5.0*
Monochlorobenzene (108907)	-5.2*

**Complete removal of the PTE for these chemicals.*

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tpy of a criteria pollutant, 10 tpy of single HAP, and 25 tpy of aggregate HAPs. Due to this facility's potential to emit over 100 tpy of a criteria pollutant, 10 tpy of single HAP, and 25 tpy of aggregate HAPs, PPG Industries, Inc., Natrium Plant, is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	
	45CSR30	Operating permit requirement.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-2046D	9/20/2010	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

The following changes were made to this Title V permit to address shutdown of the Chlorobenzene Department:

- All equipment listed in the Emission Units Table associated with Monochlorobenzene (MCB) production was removed.
- The "MCB Department" was renamed the "HCl Department". The equipment associated with HCl production is the only equipment remaining in this department.
- Condition 3.7.2, which lists non-applicability determinations, was updated as indicated in the Non-Applicability Determinations section of this Fact Sheet.
- All references to MCB production were removed from Section 7.0, and this section's heading was changed from "Requirements for the MCB Department" to "Requirements for the HCl Department."

Additionally, the following boilerplate changes were made to this permit:

- The Table of Contents was reformatted to match the current Title V Permit format.
- Conditions 3.1.13 and 3.5.10 were added to address greenhouse gas reporting.
- Conditions 3.5.3 and 3.5.5 were revised for electronic submittal of the annual certification to the USEPA.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 CFR 60, Subpart VV—Standards of Performance for Equipment Leaks of VOC in synthetic Organic Chemical Manufacturing Industry: Hydrochloric Acid (HCl) is the only remaining Hazardous Air Pollutant emitted from the former MCB Process Area (now the HCl Production Area). HCl is not on the list of chemicals to which this Subpart applies (40 CFR §60.489); therefore references to this Subpart have been removed.

40 CFR 60, Subpart RRR—Standards of Performance for VOC Compound Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI): HCl is not on the list of chemicals to which this Subpart applies (40 CFR §60.707); therefore references to this Subpart have been removed.

40 C.F.R. 61, Subpart J – National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene: This was previously not applicable; per 40 C.F.R. §63.160(b)(1), equipment to which 40 C.F.R. Part 63, Subpart H applies that are also subject to the provisions of 40 C.F.R. Part 61 will be required to comply only with the provisions of 40 C.F.R. Part 63, Subpart H. 40 C.F.R. Part 63, Subpart H is no longer applicable, however, since benzene is no longer produced at this facility.

40 C.F.R. 61, Subpart V – National Emission Standard for Equipment Leaks (Fugitive Emission Sources): No equipment covered by this Subpart is in use at this facility. Additionally, VHAP emissions are not associated with the HCl Department but only the Coal Boilers.

40 C.F.R. Part 61, Subpart FF – National Emission Standard for Benzene Waste Operations. This regulation is not applicable to the facility because benzene is no longer produced at this facility.

40 CFR 63, Subparts F, G, and H—Hazardous Organic NESHAP (HON): HCl is also not on the list of chemicals to which the HON applies; therefore, references to 40 CFR 63, Subparts F, G, and H have been removed.

40 CFR 63, Subpart FFFF—Miscellaneous Organic Chemical Manufacturing NESHAP (MON): This facility no longer produces organic chemicals covered by this Subpart as described in 40 CFR §63.2345(b). Additionally this facility was evaluated under the Mercury Chlor-Alkali MACT and EPA determined that regulation of HCl emissions was not warranted.

40 CFR 63, Subpart NNNNN—Hydrochloric Acid Production NESHAP: 40CFR 63 §63.8985(d) states that an HCl production facility is not subject to this subpart if it produces HCl through the direct synthesis of hydrogen and chlorine and is part of a chlor-alkali facility. The #1 HCl and #2 HCl Synthesis Units at PPG, Natrium facility will receive compressed hydrogen and chlorine from within the Natrium facility, which is a chlor-alkali facility.

45CSR27—To Prevent and Control the Emissions of Toxic Air Pollutants: HCl is not listed as a toxic air pollutant in 45CSR§27-10.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A
Ending Date: N/A

All written comments should be addressed to the following individual and office:

Rex Compston
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Rex Compston
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.